

# SCI MARITIME TRAINING

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Washington, D.C. 20554

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To Whom It May Concern:

In keeping with the Seamen's Church Institute's mission and long tradition of providing quality maritime education and training for the past 100 years, the following comments concerning the privatization of the examination of applicants for commercial radio licenses are respectfully submitted.

These comments, which specifically focus on the privatization of examinations for commercial radio operators, will specifically address the six issues outlined by the Federal Communication Commission in FO Docket No. 92-206. The following comments were formulated by drawing on the experience of the Seamen's Church Institute's Maritime Education and Training Division (SCI) expertise in similar privatization ventures with government agencies; specifically that of the privatization of the Maritime Administration's Radar School in 1982.

The discussion which follows specifically address the issues and concerns centering around: (1) the selection criteria for selecting the examining entity; (2) the regulatory or operating

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5

page 2

constraints to be placed on the examining entity; (3) the level of control or supervision that should be exercised by the Commission; (4) the amount and reasonableness of fees to be charged by the private entity for administering radio operator examinations; (5) the minimum number and geographic location of examinations; and; (6) the capability of the private entity to design and administer examinations for all classes of radio operator licenses.

**Selection Criteria:**

Based on prior experience of concerns associated with the selection of United States Coast Guard (U.S.C.G.) approved radar schools, the following suggestions are put forth for the establishment of criteria to be used for the selection of potential examining entities. We believe special considerations that should be addressed are: (a) the motivation of the potential entity for making a profit, (b) the support for developing and administering examinations, (c) the physical space for administering examinations, (d) the previous experience and integrity in administering competency examinations, and (e) the educational background of the entity's staff members.

**Operating Constraints:**

Operating constraints have always been a difficult issue to address in the privatization of government licensing and certification, especially when the involved entities are of such a

page 3

diverse population and encompass many disciplines (e.g., Maritime, Radio, Private, Public, Church, State, etc.). Obviously, as a private not-for-profit organization, we would suggest that the operating constraints imposed on an entity should be of the nature that will ensure the most comprehensive system for assuring an examinee was certified to be competent following a course or examination that was completed by an approved training and/or examining institution.

More importantly, we feel the paramount issue to focus on addresses operating constraints of examining entities that are related to potential conflicts of interest arising from when a training entity operates as an examining entity as well. This issue of duality has been dealt with in the maritime industry quite adequately through the implementation of inspections by a government agency, namely the United States Coast Guard. It is our understanding that the policy adhered to by the Coast Guard is one that incorporates a variety of inspections, some yearly and announced, others which are unannounced, and still others whereby an official from the agency enrolls in the course and observes the behavior of the entity with respect to its compliance with government approved syllabi and the administration of examinations. It seems to us that a similar system whereby the Commission monitors private entities in this manner would be acceptable and would not only insure ethical operation of entities but also maintain a level playing field for all entities authorized to teach and test for radio licenses.

page 4

**Control or Supervision:**

SCI suggests that the control of the issuance of a license for the various radio operator classifications should still remain with the Federal Communications Commission. Approved schools that teach and examine individuals for licenses should issue a school certificate along with a monthly summary sheet as proof that said individuals are competent and deserving of a radio license. The school certificate, upon presentation to the Commission, would entitle the individual to that specific radio license.

**Fees:**

It is our belief that fees for the licenses could be part of course fees and under no circumstances should they exceed the cost of \$35.

**Geographic Locations:**

As far as the minimum number of geographic locations for examination sites is concerned, we would suggest that all major cities should have an examination center. Some areas, such as the major metropolitan cities, should have more than one center available to the public, since overcrowding could make it impossible for one entity to service the high demand for GMDSS certification. A side benefit that arises from multiple entities in one geographic area would be the creation of a competitive atmosphere which would increase service and also reduce the cost

page 5

for courses and examinations.

**Examination Design and Administration Capabilities:**

If we assume that Commission approved schools are teaching courses aimed at imparting the necessary knowledge of radio theory for specific competencies of radio licenses, then the approved course syllabi would include the adequate design and administration of examinations for all classifications of radio licenses. In order for a school to be a Commission approved school a course syllabus that includes facility space, instructor qualifications, along with actual examinations would be required to be submitted for review.

In conclusion, SCI would like to say that the current system used for the certification of the Radar Observer endorsement has proven to be fair, affordable, and cost effective to issue through private entities in the maritime education and training sector. I would also like to thank the Commission for the opportunity to comment on these issues and look forward to hearing the outcome of all replies tended.

Sincerely Yours,

A handwritten signature in cursive script that reads "James J. Fitzpatrick, III". The signature is written in dark ink and is positioned above the printed name.

James J. Fitzpatrick, III  
Director of Operations  
The Center for Maritime Education